

1 ANTHONY T. GARASI, ESQ.  
2 Nevada State Bar No. 11134  
3 MADELINE M. ARCELLANA, ESQ.  
4 Nevada State Bar No. 13816  
5 BREMER WHYTE BROWN & O'MEARA LLP  
6 1160 N. TOWN CENTER DRIVE  
7 SUITE 250  
8 LAS VEGAS, NV 89144  
9 TELEPHONE: (702) 258-6665  
10 FAXSIMILE: (702) 258-6662  
11 agarasi@bremerwhyte.com  
12 marcellana@bremerwhyte.com  
13  
14 Attorneys for Defendant,  
15 Robertino Sazdov

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

12 BRANDON MITCHELL, an individual, ) Case No. 20-cv-2246  
13 Plaintiff, )  
14 vs. )  
15 ROBERTINO SAZDOV, an individual; )  
16 EAN HOLDINGS, LLC, a foreign limited )  
liability company dba Enterprise Rent-A- )  
Car; DOES I through XV; DOE )  
EMPLOYEES I through X, and ROE )  
CORPORATIONS I through X, inclusive, )  
18 Defendants. )  
19 \_\_\_\_\_ )

20 TO: THE UNITED STATES DISTRICT COURT FOR DISTRICT OF  
21 NEVADA:

22 PLEASE TAKE NOTICE that DEFENDANT ROBERTINO SAZDOV hereby  
23 removes the state action entitled "BRANDON MITCHELL, individually vs.  
24 ROBERTINO SAZDOV, EAN HOLDINGS, LLC dba Enterprise Rent-A-Car, DOES  
25 I-XV, DOE EMPLOYEES I-X, and ROE CORPORATIONS I-X," Case No. A-20-  
26 814493-C filed in the Eighth Judicial District Court for the State of Nevada in and for  
27 the County of Clark to this Court.

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1       The grounds for removal are based on diversity jurisdiction pursuant to 28  
2 USCS § 1332, as follows:

- 3       1. The residences of all three named parties are diverse:
  - 4           a) Plaintiff resides in Nevada;
  - 5           b) Defendant EAN Holdings, LLC is a Delaware corporation; and
  - 6           c) Defendant Sazdov is a foreign national residing in the Republic of  
7           North Macedonia.
- 8       2. The amount in controversy exceeds \$75,000.00, as Plaintiff has alleged more  
9           than \$55,114.78 in medical specials, with more than \$53,000.00 from the  
10          night of the accident alone (for the ambulance and UMC emergency room  
11          care).
- 12      3. The request is timely submitted as Mr. Sazdov was served with Summons  
13          and Complaint on November 13, 2020.

14 Dated: December 11, 2020

BREMER WHYTE BROWN & O'MEARA  
LLP

16 By: 

17       Anthony T. Garasi, Esq.  
18       Nevada State Bar No. 11134  
19       Madeline M. Arcellana, Esq.  
20       Nevada State Bar No. 13816  
21       *Attorneys for Defendant Robertino Sazdov*

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1                   CERTIFICATE OF SERVICE

2                   I hereby certify that on this 11<sup>th</sup> day of December 2020, a true and correct copy  
3 of the foregoing document was electronically delivered to CM/ECF for filing and  
4 service upon all electronic service list recipients and was served via U.S. Mail upon  
5 all parties listed below.

6                   Jared R. Richards, Esq.  
7                   Nevada Bar No. 11254  
8                   Dustin E. Birch, Esq.  
9                   Nevada Bar No. 10517  
10                  CLEAR COUNSEL LAW GROUP  
11                  1671 W. Horizon Ridge Pkwy, Suite 200  
12                  Henderson, Nevada 89012

13                  CHRISTOPHER M. KELLER, ESQ.  
14                  Nevada State Bar No. 007399  
15                  **HAWKINS MELENDREZ, P.C.**  
16                  9555 Hillwood Drive, Suite 150  
17                  Las Vegas, Nevada 89134

18                    
19                  Danielle Alvarado, an employee of  
20                  BREMER WHYTE BROWN &  
21                  O'MEARA, LLP